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UNITED STATES DISTRICT COURT
for the
DISTRICT OF NEW JERSEY

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INES LOMANDO, as Administratrix Ad
Prosequendum of the Estate of CIVIL NO. 3:08-CV-04177-FLW-TJB
LAURA LOMANDO, deceased,

Plaintiff,
-against-

Hon. Freda L. Wolfson

THE UNITED STATES OF AMERICA,
STEPHANIE REYNOLDS, M.D., TREVOR
TALBERT, M.D., DAVID HYPPOLITE,
M.D., PARKER FAMILY HEALTH CENTER,
RIVERVIEW MEDICAL CENTER, EMERGENCY
PHYSICIAN ASSOCIATES NORTH JERSEY, PC,
JOHN DOE #1 through #5, MARY MOE #1 through
#5, and XYZ CORPORATION #1 through
#5 (fictitious names representing
unknown physicians, nurses,
technicians, medical groups, medical
facilities and/or other medical
providers who participated in the
medical care of the plaintiff) jointly,
severally and in the alternative,

**DECLARATION IN OPPOSITION
TO DEFENDANT RIVERVIEW
MEDICAL CENTER'S MOTION
FOR SUMMARY JUDGMENT**

Defendants.

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ANTHONY A. LENZA, JR., an attorney duly admitted to practice law
before the United States District Court for the District of New Jersey
York, hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of
perjury:

1. I am a member of the law firm of Carl M. Erman, Esq.,
attorneys of record for plaintiff, INES LOMANDO, as Administratrix Ad
Prosequendum of the Estate of LAURA LOMANDO, deceased.

2. I am fully familiar with the facts and circumstances of this action known to date.

3. This Declaration is respectfully submitted in opposition to defendant RIVERVIEW MEDICAL CENTER's motion for summary judgment.

4. Attached hereto are plaintiff's Memorandum of Law in Opposition to Defendant RIVERVIEW MEDICAL CENTER's Motion for Summary Judgment and plaintiff's Statement of Material Facts.

5. Defendants' time to serve expert reports expires on July 31, 2010. All parties have until November 1, 2010 to complete expert depositions.

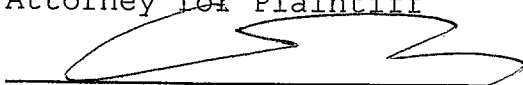
6. Plaintiff requests that a decision on this motion be postponed until after the completion of expert depositions in the event that one of defendants' experts is critical of defendant, RIVERVIEW MEDICAL CENTER.

7. In the alternative, should this Court be inclined to grant defendant RIVERVIEW MEDICAL CENTER's motion for summary judgment at this time, then it is requested that all cross-claims against the hospital be dismissed and the remaining defendants be precluded from asserting fault against the hospital at the time of trial.

WHEREFORE, it is respectfully requested that defendant RIVERVIEW MEDICAL CENTER's motion be denied in its entirety.

Dated: June 25, 2010
Staten Island, New York

CARL M. ERMAN, ESQ.
Attorney for Plaintiff


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